

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

3M COMPANY,

Plaintiff,

v.

NATIONWIDE SOURCE INC.,

Defendant.

Civil No. 0:20-cv-02694

**DECLARATION OF CONRAD A. GOSEN IN SUPPORT OF APPLICATION
FOR ENTRY OF DEFAULT**

I, Conrad A. Gosen, am an attorney at the firm of Fish & Richardson P.C., counsel of record for 3M Company. I submit this declaration in support of Plaintiff's Application for Entry of Default against Defendant Nationwide Source Inc. pursuant to Federal Rule of Civil Procedure 55. I state that the following is true and correct to the best of my knowledge and belief:

1. I am a resident of the State of Minnesota, over the age of 18, and competent to make this declaration. I could and would testify as to matters set forth herein, if called upon to do so.

2. Defendant Nationwide Source Inc. was served with the following documents on January 4, 2021 (Dkt. 14):

- Summons and Complaint (Dkts. 4 and 1 respectively);
- Plaintiff 3M Company's Rule 7.1 Corporate Disclosure Statement (Dkt. 2);
- Plaintiff's Motion for a Temporary Restraining Order and Preliminary Injunctive Relief (Dkt. 5);

- Notice of Motion for a Temporary Restraining Order and Preliminary Injunctive Relief (Dkt. 6);
- Plaintiff 3M Company's Memorandum in Support of its Motion for a Temporary Restraining Order and Preliminary Injunctive Relief (Dkt. 7);
- Declaration of Philip Eitzman (Dkt. 8);
- Declaration of Conrad A. Gosen in Support of Plaintiff 3M Company's Memorandum in Support of its Motion for a Temporary Restraining Order and Preliminary Injunctive Relief (Dkt. 9);
- [Proposed] Order Granting Plaintiff's Temporary Restraining Order and Preliminary Injunctive Relief (Dkt. 10); and
- Briefing Schedule on Plaintiff's Motion for a Temporary Restraining Order and Preliminary Injunctive Relief (Dkt. 11).

3. An affidavit signed by Manida L. Inthirath with Metro Legal declares that the aforementioned documents were served on Defendant Nationwide Source Inc. on January 4, 2021. Dkt. 16.

4. More than twenty-one (21) days have expired since the date on which Defendant was served with the Summons and Complaint.

5. Defendant has failed to file an answer or file any other responsive pleading in response to Plaintiff's Complaint.

6. This declaration is executed by declarant herein pursuant to and in accordance with the Federal Rules of Civil Procedure for the purpose of enabling Plaintiff to obtain an entry of a default against Defendant.

Signed under penalty of perjury this 26th day of January, 2021.

/s/ Conrad A. Gosen
Conrad A. Gosen

CERTIFICATE OF SERVICE

I hereby certify that on January 26, 2021, I caused the preceding document to be filed with the Clerk of Court electronically via CM/ECF and that I will deposit a copy of the foregoing document to be mailed by first class mail, postage paid, to the following:

Ira Marcus
Ira Marcus, P.A.
1313 S. Andrews Ave.
Fort Lauderdale, FL 33316

Dated: January 26, 2021

/s/ Conrad A. Gosen

Conrad A. Gosen